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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 SECURITIES AND EXCHANGE
15 COMMISSION

16 Plaintiff,

17 vs.

18 LIXIN AZARMEHR, JL REAL ESTATE
19 DEVELOPMENT CORPORATION,
20 NEVADA SKILLED NURSING LENDER,
21 LLC, and NEVADA SKILLED NURSING
22 DEVELOPMENT, LLC,

23 Defendants.

CASE NO. 2:24-CV-00707-JCM-MDC

24 **JOINT STIPULATION AND**
25 **[PROPOSED] ORDER STAYING**
26 **ALL CASE DEADLINES PENDING**
27 **THE COMMISSION'S**
28 **CONSIDERATION OF**
SETTLEMENT OFFERS FROM ALL
DEFENDANTS

19 In accordance with LR IA 6-1, LR 26-1, and LR 26-3, Plaintiff Securities and Exchange
20 Commission ("Plaintiff" or "SEC") and Defendants Lixin Azarmehr, JL Real Estate Development
21 Corporation, Nevada Skilled Nursing Lender, LLC, and Nevada Skilled Nursing Development,
22 LLC (collectively "Defendants") (all collectively referred to herein as the "Parties"), and by and
23 through their counsel of record, hereby stipulate and agree, subject to the Court's approval, to stay
24 all remaining case deadlines. Good cause exists for the stay of case deadlines as follows:

- 25
- 26 1. Following extensive negotiations, the SEC and Defendants have reached agreements
27 in principle on the material terms of proposed settlements that would resolve the SEC's
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1 claims against each Defendant in full, and resolve the case in its entirety.

- 2 2. Only the Commission, acting formally by majority vote of its four Commissioners, has
3 the regulatory authority to accept the proposed settlements. *See* Section 21 of the
4 Exchange Act (15 U.S.C. § 78u).
- 5 3. Counsel for the SEC in this matter represents that the process for presenting proposed
6 settlements to the Commission for consideration typically takes 45 to 60 days from this
7 point forward.
- 8 4. In the interests of efficiency, and conservation of the Court's and the Parties' resources,
9 Counsel for the SEC and Defendants agree that there is good cause to request a stay of
10 all remaining case deadlines pending the Commission's consideration of the proposed
11 settlements, and that the request is made in good faith and not for purposes of delay.
- 12 5. To date, the SEC and Defendants have spent considerable time and resources litigating
13 this matter. If a stay is not granted while the Commissioners contemplate the proposed
14 settlements, the Parties anticipate the need to expend significant additional resources
15 over the next 45 to 60 days, and beyond, including on discovery, discovery-related
16 motions, experts, and trial preparation because the current scheduling order in this
17 action establishes, among other deadlines, a June 30, 2025 deadline for Defendants to
18 complete outstanding discovery productions, a July 15, 2025 deadline to complete up
19 to three depositions, an August 15, 2025 deadline for expert disclosures, and a
20 September 30, 2025 deadline to complete fact discovery. (ECF No. 42).
- 21 6. The Commission's approval of the proposed settlements would resolve this action in
22 its entirety, without the need for further litigation or trial as to any Defendant.
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1 **FOR THE REASONS SET FORTH ABOVE, IT IS STIPULATED AND AGREED,**
2 by and among counsel for the Parties, subject to the Court's approval, that:

3 a. This action is stayed for 60 days from the date of entry of this Order, pending
4 consideration of the proposed settlements by the Commission; and

5 b. If the proposed settlements have not been approved by the Commission, and filed with
6 the Court within 60 days from the entry of this Order, the Parties will file a status report
7 with the Court on the 60th day and either (i) seek a further extension of case deadlines if
8 good cause exists, or (ii) propose a new case schedule.
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10 **IT IS SO STIPULATED.**

11 **Dated:** June 27, 2025

12
13 By: /s/ Rebecca R. Dunnan
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Attorneys for Defendants

25 **IT IS SO ORDERED:**

26 **UNITED STATES MAGISTRATE JUDGE**

27 **DATED:** _____
28

PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,
100 F STREET NE, WASHINGTON, DC 20549
Telephone No. (202) 551-3813; Facsimile No. (703) 420-6032.

On June 27, 2025, I caused to be served the document entitled **JOINT STIPULATION AND [PROPOSED] ORDER STAYING ALL CASE DEADLINES PENDING THE COMMISSION'S CONSIDERATION OF SETTLEMENT OFFERS FROM ALL DEFENDANTS** on all the parties to this action addressed as stated on the attached service list:

☐ **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

☐ **PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

☐ **EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Washington, DC, with Express Mail postage paid.

☐ **HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

☐ **UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Washington, DC.

☐ **ELECTRONIC MAIL:** By transmitting the document by electronic mail to the following electronic mail addresses.

☒ **E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

☐ **FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 27, 2025

/s/ Rebecca R. Dunnan
Rebecca R. Dunnan